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9 **UNITED STATES BANKRUPTCY COURT**  
10 **NORTHERN DISTRICT OF CALIFORNIA**  
11 **SAN FRANCISCO DIVISION**

12 **In re:**

13 **PG&E CORPORATION,**

14 **- and -**

15 **PACIFIC GAS AND ELECTRIC**  
16 **COMPANY,**

17 **Debtors.**

- 18 ☐ Affects PG&E Corporation  
19 ☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

20 *\* All papers shall be filed in the Lead Case, No.*  
21 *19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

***EX PARTE APPLICATION TO CONTINUE  
DECEMBER 15, 2020 HEARING ON  
OMNIBUS CLAIM OBJECTIONS WITH  
RESPECT TO CERTAIN CLAIMS***

[No hearing requested]

1 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as  
2 debtors and reorganized debtors (collectively, the “**Reorganized Debtors**”) in the above-captioned  
3 chapter 11 cases (the “**Chapter 11 Cases**”) hereby submit this *Ex Parte* Application (the “**Application**”) for an order continuing the December 15, 2020 hearing (the “**December 15 Hearing**”) on the  
4 Reorganized Debtors’ Fortieth through Forty-Fifth Omnibus Claim Objections [Docket Nos. 9455 –  
5 9466] (collectively, the “**Omnibus Objections**”)<sup>1</sup> with respect to certain Claims to March 24, 2021.

7 On November 5, 2020, the Reorganized Debtors filed the Omnibus Objections, which seek to  
8 disallow and expunge or allow in a reduced amount 782 Claims. In the individualized notice sent to  
9 each Claimant along with the Omnibus Objections, the Reorganized Debtors stated that if a Claimant  
10 opposed disallowance of its Claim (or allowance in a specific Reduced Amount), it must provide, *inter*  
11 *alia*, an explanation for the asserted amount of the Proof(s) of Claim, a concise statement setting forth the  
12 reasons why the Bankruptcy Court should not sustain the relevant Omnibus Objection, and a declaration  
13 under penalty of perjury of a person with personal knowledge of the relevant facts that support the statement.  
14 The Reorganized Debtors received formal and informal responses to the Omnibus Objections (each,  
15 a “**Response**”) from 78 Claimants, a list of whom is attached hereto as **Exhibit 1** (collectively,  
16 the “**Responding Claimants**”).

17 The Reorganized Debtors hope to resolve the objections to which the Responses relate  
18 consensually, without need for evidentiary hearings before the Court. To that end, the Reorganized  
19 Debtors and their advisors are reviewing the Responses and beginning an outreach and negotiation  
20 process with the Responding Claimants. Given the volume of the Responses and the factual complexities  
21 of each, however, the Reorganized Debtors will not be in a position to update the Court on the status of  
22 the Responses at the December 15 Hearing, and setting evidentiary hearings at that time would be  
23 premature and inefficient. Such a continuance will not prejudice the Responding Claimants; to the  
24 contrary, it will inure to their benefit by providing the Reorganized Debtors adequate time to consider  
25 the Responses and attempt to reach an out-of-court resolution with respect to their Claims.

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27 <sup>1</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in  
28 the Omnibus Objections.

1           Given the volume of the Responses and communication difficulties with some of the Responding  
2 Claimants, it is not efficient or practical for the Reorganized Debtors to seek consensual continuances of  
3 the December 15 Hearing with respect to each Response. However, the Reorganized Debtors are serving  
4 this Application on all of the Responding Claimants by either email or First-Class Mail.

5           WHEREFORE the Reorganized Debtors respectfully request entry of an order continuing the  
6 December 15 Hearing with respect to the Responding Claimants' Claims to March 24, 2021.

7 Dated: December 3, 2020

**KELLER BENVENUTTI KIM LLP**

8 By: /s/ Dara L. Silveira  
9 Dara L. Silveira

10 *Attorneys for Debtors and Reorganized Debtors*